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FILE NO.: 12949.0002

By ECF and E-mail

May 22, 2015

The Honorable Lisa Margaret Smith
United States Magistrate Judge, Southern District of New York
300 Quarropas Street, Courtroom 520
White Plains, New York 10601-4150

Re: *IHS Dialysis, Inc. v. DaVita, Inc.*, Docket No. 12-cv-2468 (ER) (LMS)

Dear Judge Smith:

We represent Plaintiffs in the referenced matter. We write to provide the Court with the agenda for the May 27, 2015 conference. At the conference, the parties and the Court will be addressing IHS's motion to compel. Attached as Exhibit A is IHS's letter brief to compel disclosure of documents sought in IHS's First Request for Production and Second Request for Production. Attached as Exhibit B is Defendant's letter brief in opposition to IHS's motion.

Respectfully yours,

/s/ Kevin G. Donoghue

Kevin G. Donoghue

So stipulated:

John S. Gibson

John S. Gibson
Partner, Crowell & Moring LLP

*Counsel for Defendant DaVita HealthCare
Partners Inc. f/k/a DaVita Inc.*

cc: All Parties via ECF